

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

**MEDICAL SALES MANAGEMENT, INC.'S
JOINDER IN AMERIDOSE, LLC'S
OPPOSITION TO LIBERTY INDUSTRIES, INC.'S
MOTION FOR A LOCAL RULE 16.1 CONFERENCE**

One June 25, 2014, Defendant, Liberty Industries, Inc. filed a motion for a Local Rule 16.1 Scheduling Conference (MDL Dkt. No 1226). Defendant, Ameridose, LLC, filed an Opposition to that motion on July 7, 2014 (MDL Dkt. No 1246). Defendant Medical Sales Management, Inc. hereby joins in and incorporates by reference Ameridose's Opposition. Specifically, all pleadings and discovery against Medical Sales Management Inc. are stayed by virtue of CMO No. 6. Therefore, Liberty's request is premature and for the reasons stated in Ameridose's Opposition, Medical Sales Management, Inc. respectfully requests that this Court deny Liberty's Motion for a Local Rule 16.1 Scheduling Conference.

Dated: July 9, 2014

Respectfully submitted,

Medical Sales Management, Inc.

By its attorneys,

/s/ Daniel M. Rabinovitz

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2014, a true copy of the foregoing was filed in accordance with the Court's Electronic Filing Guidelines and will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Daniel M. Rabinovitz